

**Docket No.:** 00-0677  
**Pre-Bench Date:** 12-04-01  
**Deadline:** N/A

## **M E M O R A N D U M**

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**TO:** The Commission

**FROM:** John D. Albers, Administrative Law Judge

**DATE:** November 30, 2001

**SUBJECT:** NANPA, on behalf of the Illinois Telecommunications Industry  
  
Petition for Approval of Numbering Plan Area Relief Planning  
for the 618 Area Code

**REGARDING:** Commission concerns raised at November 29, 2001 meeting.

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At its November 29, 2001 meeting, the Commission requested additional information regarding the proposed relief alternatives for the 618 Numbering Plan Area ("NPA"). This memorandum will attempt to address the Commission's concerns to the extent that those concerns are addressed in the record.

According to the petition filed by NeuStar, Inc., acting in its role as the North American Numbering Plan Administrator ("NANPA"), members of the telecommunications industry, along with NANPA representatives and a member of the Commission Staff, met on September 6, 2000 to review and discuss 12 relief alternatives for the 618 NPA. Among the 12 alternatives were nine two-way geographic splits, one all-services distributed overlay, and two concentrated growth overlays.<sup>1</sup> Maps depicting the alternatives are attached to the petition. A document describing the general attributes of geographic splits and overlays is also attached to the petition. The petition indicates that a consensus was reached at the September 6, 2000 meeting to recommend that the all-services distributed overlay be adopted.

The first status hearing in this matter was held on November 28, 2000. Notice of this status hearing was served on all of the clerks of all municipalities and the designated agents of all local and interexchange carriers throughout the entire state.

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<sup>1</sup> A concentrated growth overlay is an overlay NPA which would be initially assigned to the portion of the existing NPA experiencing the most growth and new telephone numbers in that portion would be assigned from the new NPA. As more relief is required, the geographic area served by the new NPA could expand within the area served by the existing NPA.

The advantages and disadvantages of geographic splits and overlays are addressed in the testimony of several witnesses: Staff Exhibit 1.00, pp. 7-8 (direct testimony of Harvey Nelson); Ameritech Exhibit 1.0, pp. 4-9 (direct testimony of Cassie Yang); Verizon Exhibit 1.0, pp. 2-4, 5 (direct testimony of Terry Haynes); Egyptian Telephone Cooperative Association Exhibit 1, pp. 3, 7-10 (direct testimony of Kevin Jacobsen); Cingular Wireless Exhibit 1, pp. 3-4, 7-11 (direct testimony of Peter Long); and Cingular Wireless Exhibit 2, pp. 1-3 (rebuttal testimony of Peter Long).

The time necessary for implementing a geographic split and overlay is also addressed in the testimony of certain witnesses: Ameritech Exhibit 1.0, pp. 9-14 (direct testimony of Cassie Yang); Egyptian Telephone Cooperative Association Exhibit 1, pp. 4-7 (direct testimony of Kevin Jacobsen); and Cingular Wireless Exhibit 1, pp. 4-7 (direct testimony of Peter Long). No party objected to the notion that proper implementation of a geographic split requires more time than implementation of an overlay. According to Ameritech witness Yang, at least 18 months should be set aside for implementation of a geographic split. (Ameritech Exhibit 1.0, p. 9) Cingular Wireless witness Long, however, testifies that up to two years may be necessary if the Commission adopts a geographic split as the relief alternative. Mr. Long states that two years may be necessary because it may take that long to get all wireless customers to bring in their handsets for reprogramming. If a geographic split is chosen, Mr. Long recommends a longer implementation plan for wireless carriers. (Cingular Wireless Exhibit 2, p. 3) As indicated in the proposed Second Interim Order, the projected exhaust date for the 618 NPA is expected to occur in the third quarter of 2002. In contrast, when exhaust was expected to occur in the third quarter of 2001, NANPA recommended that permissive dialing for the overlay relief alternative begin on July 14, 2001. None of the parties advanced an updated implementation schedule. Rather, the parties indicated their preference to develop an implementation schedule once they knew which relief alternative would be selected by the Commission.

The record does not contain any discussion of the actual cost of implementing either a geographic split or an overlay. For the most part, any reference to cost pertains to the cost of reprinting documents and advertising containing telephone numbers which would be changed under a geographic split. Mr. Long testifies, however, that the cost to Cingular Wireless and its customers to reprogram handsets "would be in the millions of dollars." (Cingular Wireless Exhibit 2, p. 3)

If the Commission wishes to adopt a geographic split, it is not possible, based on the record, to recommend a particular geographic split alternative. Nor does the record address which portion of the existing 618 NPA should receive the new area code under any of the geographic split alternatives.

JDA